

DECLARATION OF MARA BALTABOLS

Pursuant to 28 USC §1746, I swear under penalty of perjury that the following is true:

1. My name is Mara Baltabols. I am over the age of twenty-one and I am competent to make this Declaration and I have personal knowledge of the matters set forth herein.

2. I am one of the attorneys from the law firm Fish Potter Bolaños, P.C. representing Plaintiff and the putative class.

3. I have extensive experience representing consumers, and employees in labor and employment disputes. I have handled disputes with the Equal Employment Opportunity Commission, and in the state and federal courts in Illinois. I have litigated multiple cases in the United States District Court for the Northern District of Illinois.

4. I have lectured at educational seminars for lawyers and other professionals. I was a featured speaker for a CLE sponsored by the Chicago Bar Association on issues related to consumer law. I was a panel speaker at a CLE organized by the National Association of Consumer Bankruptcy Lawyers on effective adversary proceedings and litigation of consumer law cases.

5. I have actively litigated class action cases brought pursuant to the Illinois Biometric Information Privacy Act (“BIPA”), 740 ILCS 14/1 et seq. since March 2019. I have litigated consumer class action cases since October 2017, including cases filed pursuant to the Telephone Consumer Protection Act (“TCPA”), 47 U.S.C. § 227, et seq. and the Fair Debt Collection Practices Act (“FDCPA”), 15 U.S.C. 1692 et seq. I have litigated consumer cases since 2010.

6. Fish Potter Bolaños, P.C. has been found adequate counsel in multiple BIPA class action cases. Our law firm’s resume is attached hereto.

7. I have served as counsel in dozens of claims brought under BIPA and helped to recover millions of dollars for my clients in these cases. As a result, I am very familiar with the

risks, defenses, strengths, and weaknesses of these cases. I am familiar with the amounts at which other BIPA cases have settled in the state of Illinois.

8. I have been involved in this litigation from the start. The settlement in this case is particularly appropriate and fair given the potential defenses that are available to the Defendant, uncertainty with pending appeals, size of the class, and several other factors that I consider when making settlement decisions.

9. The proposed Settlement Agreement provides an excellent result for the Class Members. It provides Class members a definite recovery and was entered into at a time when the outcome was uncertain. The Settlement Agreement entered into in this case represents a reasonable compromise of a disputed claim. Given the uncertainty relating to the law at issue at the time of the negotiations, including the statute of limitations, LMRA preemption, potential release of claims, and what constitutes a biometric identifier, I believe it to be a more than fair outcome for the Class.

10. Costs and expenses incurred by Fish Potter Bolaños, P.C. in relation to this Settlement include \$468.57 in costs for filing and mailing fees, Westlaw, copying, and other expenses.

_____/s/ Mara Baltabols_____

Dated: September 16, 2022



FIRM OVERVIEW

The Fish Potter Bolaños, P.C. has experience representing employees and employers in labor and employment disputes, including before the Illinois Department of Labor, the United States Department of Labor, the Illinois Department of Human Rights, the National Labor Relations Board, the EEOC, and in the state and federal courts in Illinois.

Our efforts have resulted in numerous favorable outcomes for our clients. Our attorneys are known for their knowledge of labor and employment matters and have been asked to present and publish in various classrooms and on-line publications to educate others on how this area of the law works. We also have an active *pro bono* practice and provide employment counseling for no charge to dozens of low income and elderly clients each year through a partnership with Prairie State Legal Services.

ATTORNEY PROFILES

MARA BALTABOLS

Mara is an accomplished civil litigator and class action attorney with a wide-range of experience litigating in state and federal court. Mara was recognized as an Illinois Super Lawyer Rising Star in Civil Defense Litigation in 2013, and in Consumer Law in 2016-2019. Mara is a strong believer in taking the best cases to trial. She served as a primary attorney in a case brought by a senior citizen against a major loan servicer, *Hammer v. RCS*, that resulted in a \$2,000,000

Chicago Office
111 East Wacker Drive
Suite 2600
Chicago, Illinois 60601

 312-861-1800
 www.fishlawfirm.com

Suburban Office
200 East 5th Avenue
Suite 123
Naperville, Illinois 60653

jury verdict upheld on post-trial motions. She was a featured speaker at NACBA's 23rd Annual Convention discussing effective adversary proceedings and successfully preparing cases for trial.

Mara previously worked as an attorney at Bock, Hatch, Lewis & Oppenheim, LLC (f/k/a Bock & Hatch, LLC) and at Sulaiman Law Group, Ltd. d/b/a Atlas Consumer Law.

Mara obtained her J.D. from the University of South Carolina in 2009, and her undergraduate degree from the University of Colorado at Boulder in 2003. Mara is a member of the Illinois Bar and admitted to practice in the Northern and Southern federal district courts in Illinois. She is also admitted to the Eastern District of Wisconsin and Eastern District of Michigan.

MARIA DE LAS NIEVES BOLAÑOS

Ms. Bolaños was influenced from a young age by the work and activism of her single mother who worked to provide health care and educational services to Central Washington's Yakima Valley, including through work with migrant farmworkers and community organizations. It was this background that created Ms. Bolaños' interest in employment law and drew her to her first legal job with mentor and workers' rights activist Robin Potter, who later became her law partner.

Ms. Bolaños represents workers in wage and hour, False Claims Act, and employment discrimination and retaliation and litigation. She has significant litigation experience at the State and Federal level, as well as with local administrative agencies, including Equal Employment Opportunity Commission, the Illinois Department of Human Rights and the Illinois Education

Labor Relations Board. Ms. Bolaños' experience includes representation of single plaintiffs, class and large class action cases with exceptional results, including a \$14 million dollar settlement in a class action sexual harassment case in *Brown, et al. v. Cook County, et al.*, No. 17-cv-8085 (N.D. Ill. 2020).

Ms. Bolaños is a 2009 graduate of DePaul University College of Law. She serves on the Executive Board of the National Employment Lawyers Association (NELA) and is VP of Diversity, Equity, and Inclusion on its Executive Committee. She also chairs NELA's Low Wage Worker Practice Group and serves on its Legislative Action Committee and is a member of NELA's Illinois affiliate, the Illinois State Bar Association, and the National Lawyers Guild's Chicago Labor and Employment Committee. Ms. Bolaños serves on the ARISE Chicago Legal Advisory Board and serves on the Board for In These Times Magazine.

Ms. Bolaños frequently lectures on various employment law matters, including NELA's Annual Conventions, NELA Illinois' Seventh Circuit Conference, the Decalogue Society, Illinois Legal Services Committee for Immigrants, and a variety of other organizations. Ms. Bolaños co-authored a brief on behalf of *amici curiae* Steve Viscelli, Domingo Avalos, Gabriel Procel, Brion Gray, James Zuber, Hector Zelaya, Desiree Ann Wood, the Wage Justice Center and Real Women in Trucking, Inc., in the case, *New Prime Inc. v. Oliveira*, 139 S.Ct. 532, 202 L.Ed. 2d 536 (2019).

ALENNA BOLIN

For thirty years, Ms. Bolin has advocated for employees from all walks of life and diverse backgrounds, in workplace civil rights, FMLA, sexual harassment, discrimination,

Chicago Office
111 East Wacker Drive
Suite 1600
Chicago, Illinois 60601

 312-861-1800
 www.fishlawfirm.com

Suburban Office
200 East 5th Avenue
Suite 123
Naperville, Illinois 60653

retaliation and retaliatory discharge, and related employment matters. Her creative litigation strategies and advanced writing abilities combine to make her a skilled advocate for her clients. She treats clients with respect and compassion while guiding them through the legal process.

She has served as Of Counsel to the firm (formerly Potter Bolaños LLC and Robin Potter & Associates) since 2010.

Ms. Bolin previously practiced in the areas of civil rights, contracts, securities, commodities, and fraud, in addition to employment law. She was part of the two-lawyer trial team that won a \$500,000 jury verdict on workplace intentional infliction of emotional distress, a verdict that was later upheld on appeal in *Naeem v. McKesson Drug Co.*, 444 F.3d 59 (7th Cir. 2006). She was extensively involved in researching and drafting the winning briefs in *Walters v. Metropolitan Educational Enterprises, Inc.*, 519 S.Ct. 202 (1997), in which the U.S. Supreme Court issued a decision favorable to employees. More recently, she participated in case development and discovery on the legal team that achieved a \$14 million dollar settlement in a class action sexual harassment case in *Brown v. Cook County, et al.*, No. 17-cv-8085 (N.D. Ill. 2020). She has served as a contributing author for the Midwinter Report of FMLA Cases, published by the FMLA subcommittee of the Section of Labor and Employment Law of the American Bar Association.

Ms. Bolin received her J.D. from the University of California, Davis, School of Law, and her B.A., *cum laude*, from Northern Illinois University. During law school, she authored an article that won awards for excellence in writing and was published as the Pease Environmental

Law Review. Along with her J.D., she received a Public Interest Law Program Certificate. Ms. Bolin is an active member of the National Employment Lawyers Association.

PATRICK COWLIN

Mr. Cowlin is an experienced attorney who primarily represents employees in wage and hour, discrimination, disparate impact, harassment, retaliation, FMLA, and other employment and *qui tam* cases. He has successfully litigated and negotiated cases involving individual plaintiffs, as well as class actions and collective actions. He has also represented union members in contract arbitration and administrative proceedings, and public school parents and students in class litigation.

Mr. Cowlin was recognized as a top rated employment litigation attorney in Illinois from 2017-2021, earning a “Rising Star” designation from Illinois Super Lawyers. He graduated with a B.B.A. in Finance from University of Wisconsin-Madison and graduated *cum laude* from DePaul University College of Law in 2012.

Mr. Cowlin is admitted to the Illinois Bar and the U.S. District Court for the Northern District of Illinois. He is a member of the National Employment Lawyers Association (“NELA”), NELA-Illinois, and the National Lawyers Guild. He is a part of NELA-Illinois’ Legislative Action Committee, which works to ensure Illinois Law appropriately protect employees’ rights.

DAVID FISH

Chicago Office
111 East Wacker Drive
Suite 1600
Chicago, Illinois 60601

 312-861-1800
 www.fishlawfirm.com

Suburban Office
200 East 5th Avenue
Suite 123
Naperville, Illinois 60653

Mr. Fish graduated #2 in his law school class from Northern Illinois University College of Law after graduating from Illinois State University. Prior to starting his own firm, Mr. Fish was employed by larger law firms. (Including, Jenner & Block in Chicago, Illinois as a summer associate and Klein, Thorpe & Jenkins/Collins Law). He is a member of the National Employment Lawyers Association which is a group of employment lawyers.

Mr. Fish has, on several occasions, lectured at educational seminars for lawyers and other professionals. He has moderated a continuing legal education panel of federal magistrates and judges on the Federal Rules of Civil Procedure, he has presented before the Illinois State Bar Association on electronic discovery rules, and he testified before the United States Judicial Conference in Dallas, Texas regarding electronic discovery issues.

Mr. Fish's publications include: "[Enforcing Non-Compete Clauses in Illinois after Reliable Fire](#)", [Illinois Bar Journal](#); "[Top 10 wage violations in Illinois](#)", [ISBA Labor and Employment Newsletter](#) (August, 2017); "[Physician Non-Complete Agreements in Illinois: Diagnosis—Critical Condition; Prognosis- Uncertain](#)" [DuPage County Bar Journal](#) (October 2002); "Are your clients' arbitration clauses enforceable?" [Illinois State Bar Association, ADR Newsletter](#) (October 2012); "[The Legal Rock and the Economic Hard Place: Remedies of Associate Attorneys Wrongfully Terminated for Refusing to Violate Ethical Rules](#)", [of W. Los Angeles Law Rev.](#) (1999); "[Zero-Tolerance Discipline in Illinois Public Schools](#)" [Illinois Bar Journal](#) (May 2001); "[Ten Questions to Ask Before Taking a Legal-Malpractice Case](#)" [Illinois Bar Journal](#) (July 2002); "[The Use Of The Illinois Rules of Professional Conduct to Establish The Standard of Care In Attorney Malpractice Litigation: An Illogical Practice](#)", [Southern](#)

Illinois Univ. Law Journal (1998); “An Analysis of Firefighter Drug Testing under the Fourth Amendment”, International Jour. Of Drug Testing (2000); “Local Government Web sites and the First Amendment”, Government Law, (November 2001, Vol. 38).

KIMBERLY HILTON

Ms. Hilton has worked in the legal field for over twenty years as an attorney, legal assistant, a paralegal, and a law clerk. Ms. Hilton’s primary focus throughout her career has been in the area of labor and employment. Ms. Hilton has litigated in the state and federal courts and before agencies such as the Illinois Department of Human Rights, the Equal Employment Opportunity Commission, the Illinois Human Rights Commission and the American Arbitration Association.

Ms. Hilton graduated *cum laude* from The John Marshall Law School, Chicago, Illinois in 2010. Ms. Hilton received her Bachelor of Arts in English and Political Science from Cornell College, Mt. Vernon, Iowa in 2003. During law school, Ms. Hilton worked as a judicial extern for the Illinois Appellate Court, First District in Chicago, wrote and edited articles for The John Marshall Law Review and participated in John Marshall’s Moot Court program.

Ms. Hilton is a member of the National Employment Lawyers Association – Illinois and the Illinois State Bar Association. Ms. Hilton has also presented two CLE classes for the DuPage County Bar Association one about the EEOC and IDHR claim procedure and the other about COVID-19 and the new laws that were enacted in light of the pandemic.

JAMES GREEN

Mr. Green represents individuals denied workers' compensation, social security or other disability benefits and unions and union members in labor negotiations and arbitrations, unfair labor practices and dismissal cases.

For more than thirty years Mr. Green has successfully represented hundreds of individuals in claims for Workers' Compensation benefits. He has assisted injured workers in a wide range of employment settings, including airline industry, health care institutions and public schools to obtain the full benefits they are entitled to receive under the Illinois Workers' Compensation Statute. He also represents clients who have been denied Social Security Disability Benefits. He is available to assist claimants in guiding them through the entire maze of the bureaucratic process from filing an application to representing them in a hearing before an Administrative Law Judge, if their claims are denied.

Mr. Green has worked closely with the Chicago Teachers Union for the last ten years. He has represented it in labor arbitrations and unfair labor practice charges before the Illinois Labor Relations Board and individual teachers in statutory dismissal hearing and in workers' compensation claims. He previously served as the General Counsel for Teamsters Local 726 from 1994-2009, negotiating contracts and representing the Union in all aspects of its operations.

Mr. Green has deep roots in the labor movement prior to practicing law. He began his career organizing child-care workers in Chicago, then worked as a staff director of a local union, managed a Health, Welfare and Pension fund for the Midwest Region for the International Ladies Garment Workers Union.

Chicago Office
111 East Wacker Drive
Suite 1600
Chicago, Illinois 60601

 312-861-1800
 www.fishlawfirm.com

Suburban Office
200 East 5th Avenue
Suite 123
Naperville, Illinois 60653

Mr. Green is an active member of the Chicago Bar Association, the Workers' Compensation Lawyers' Association and the AFL-CIO Union Labor Alliance. Mr. Green graduated *cum laude* from the John Marshall Law School.

JOHN KUNZE

John C. Kunze graduated from The University of Illinois Champaign-Urbana with a Bachelor of Arts Degree in History. Mr. Kunze graduated *cum laude* from The John Marshall Law School in Chicago, Illinois. While at John Marshall John was a member of Law Review, co-founded The Video Game Law Society, and was the founding editor of the Society's Newsletter.

Mr. Kunze is a member of the National Employment Lawyers Association and the Illinois State Bar Association.

SETH MATUS

For more than twenty years, Mr. Matus has worked as a lawyer serving businesses ranging from start-ups and family companies to high tech firms, professional organizations, retailers and temporary labor services. Mr. Matus has repeatedly saved employers facing class-action overtime lawsuits from multi-million dollar liability and obtained favorable outcomes for general contractors entangled in complex construction disputes.

Mr. Matus is a leader in developing and implementing innovative policies and procedures to protect confidential information and trade secrets and in ensuring that businesses comply with applicable law after breaches involving personal data. He has been certified as an information

privacy professional in US private-sector law by the International Association of Privacy Professionals and has presented several seminars on information privacy topics to business owners and human resources professionals. Mr. Matus also presented a CLE to the DuPage County Bar Association about the laws enacted in response to the COVID-19 pandemic and the implications for small businesses in response.

Mr. Matus received his JD from the University of Colorado in 1996 and his B.A. from Rutgers in 1992. He is a member of the Illinois, Colorado, New Mexico bars.

THALIA PACHECO

Thalia serves as the leader of our employment discrimination department where she litigates the rights of workers. She received her B.A. from Northern Illinois University (DeKalb, Illinois) and received her J.D. from DePaul University College of Law (Chicago). At DePaul, Thalia was the Editor-in-Chief of the Journal of Women, Gender & Law.

While attending law school, Thalia focused her studies in labor and employment law and interned at C-K Law Group: The Law Offices of Chicago-Kent in its Plaintiff's Employment Law Clinic and Chicago Public Schools in its Labor and Employee Discipline Department. Thalia has worked at a number of Chicago employment law firms in the area, including Siegel and Dolan, The Case Law Firm, and employment defense firm Franczek PC. Thalia is a member of the Hispanic Lawyers Association of Illinois and the American Bar Association. Thalia is fluent in Spanish. Thalia has presented a CLE for the DuPage County Bar Association about the leave laws related to the COVID-19 pandemic.

ROBIN POTTER

Robin Potter moved to Chicago in 1978, where she has built a nationwide private practice trying and litigating Labor & Employment, Discrimination, Sex Harassment, Whistleblower, Wage & Hour and False Claims Act (FCA) individual and class action cases. Her FCA cases have returned ten of millions of dollars to the U.S. treasury and private carriers. She has been proud to serve as counsel to the Chicago Teacher's Union, union members and leadership working to reform their unions and increase democracy equity and justice in the workplace.

Robin served as a government supervisor in overseeing and conducting elections in the Laborers' International Union (LIUNA). She was also the court-appointed Claims Administrator in *Smith v. NIKE*, Case No. 03 C 9110 (N.D. Ill., J. Shadur), a class action race discrimination case and was the Special Master in *EEOC v. The Dial Corporation*, Case No. 99 C 3356 (N.D.IL.), a pattern and sexual harassment case.

Robin has frequently lectured, including at the following venues: American Bar Association Midyear, annual, labor & employment, and EEOC meetings; Illinois State Bar Association (Labor Section); National Employment Lawyers' Association, Association of Trial Lawyers of America (Civil Rights and Individual Employee Rights Sections); the Taxpayers Against Fraud (lawyers representing plaintiffs in Qui Tam litigation); the American Federation of Teacher and American Federation of Labor Lawyers' Coordinating Committee; and the Practicing Law Institute.

Chicago Office
111 East Wacker Drive
Suite 1600
Chicago, Illinois 60601

 312-861-1800
 www.fishlawfirm.com

Suburban Office
200 East 5th Avenue
Suite 123
Naperville, Illinois 60653

In 2013, the National Lawyers' Guild, Chicago honored Robin and her firm's co-recipients of the Arthur Kinoy People's Law Award, "in recognition of tireless advocacy on behalf of the Chicago Teachers Union and Chicago Public School students, parents, and employees." Also in 2016, Robin was a finalist for the Public Justice Trial Lawyer of the Year Award for "outstanding contribution to the public interest" for her work in the case *United States and State of Illinois, ex rel Absher v. Momence Meadows Nursing Center, Inc.* The Chicago Democratic Socialists of America honored Robin at their 2014 Debs-Thomas-Harrington Dinner for her work supporting the labor movement and employees' rights.

Robin helped found the Nation Employment Lawyers Association and its Illinois chapter, NELA-Illinois, and remains an active member of both organizations. She is also a member of Taxpayers Against Fraud, the Chicago Bar Association, and the American Bar Association Litigation and Labor and Employment Section. She is on the Board of Directors of Advocates for Justice, a New York City based group engaged in nationwide advocacy and litigation, in public education and other areas of law reform.

Robin is a 1977 graduate of the University of Iowa Law School.

SANDY ALPERSTEIN

Sandy holds a B.A. in English from the University of Florida and is graduate of the University of Chicago Law School (*cum laude*, 1990). Sandy was a Staff Member of the Law Review and is admitted to the Illinois State Bar and the Northern District of Illinois. Sandy has represented clients in varied settings such as large law firms (Mayer, Brown), in-house (UARCO

Chicago Office
111 East Wacker Drive
Suite 1600
Chicago, Illinois 60601

 312-861-1800
 www.fishlawfirm.com

Suburban Office
200 East 5th Avenue
Suite 123
Naperville, Illinois 60653

Incorporated), smaller boutique law firms, and in her own private practice. Sandy is an active volunteer in the disability community, participating in special education law and policy advocacy on the federal, state, and local levels.

ROGELIO DELATORRE

Mr. Delatorre is a second year law student from Chicago-Kent College of Law. Mr. Delatorre is a first-generation Mexican-American whose parents are originally from Mexico but settled in the Chicagoland area. As a student, Mr. Delatorre is a member of the Hispanic Lawyers Association of Illinois, the Bar Representative on the Chicago-Kent Hispanic=Latinx Law Student Association Executive Board, the Treasurer of the Chicago-Kent Student Humanitarian Network, and a member of Chicago-Kent's Student Alumni Board. Additionally, Mr. Delatorre is the Vice-Chair of Communications of the Hispanic National Bar Association – Law Student Division.

Mr. Delatorre graduated with his Bachelor's Degree from Benedictine University where he majored in Accounting and obtained a minor in Political Science. Mr. Delatorre is also an alumnus of the Emma Bowen National Foundation, a national organization that provides diverse students with internships in the media industry.

Mr. Delatorre is fluent in Spanish. He is passionate about helping diversify the legal profession, helping the Latinx Community, and helping others in the process.

ASHLEY FEENY

Ms. Feeny has five years of legal assistant/paralegal experience. She graduated from Saint Xavier University in 2015 with a bachelor's degree in Criminal Justice and a minor in Middle Eastern Studies. She has experience in Real Estate Law, Class Actions, EEOC, NLRB and IDHR cases.

JESSICA HOWARD

Jessica is a paralegal who assists with our Workers' Compensation Cases, Social Security, and Employment Law Teams. Jessica also has a background in professional writing.

NICOLE SANDERS

Nicole is an experienced legal assistant/paralegal with over 28 years' experience in the legal field. Nicole has helped attorneys and clients in many different areas of the law including: employment law, personal injury, workers' compensation, real estate, divorce, and estate planning. She currently serves to support our employment attorneys and litigators.

REPRESENTATIVE CASES

Some examples of class, collective, and/or employment litigation in which Fish Potter Bolaños, P.C. (or our prior firms, The Fish Law Firm PC, Potter Bolaños, LLC, and Robin Potter & Associates) has served as counsel include:

- a. *Brown v. Cook County*, No. 17-C-8085, 332 F.R.D. 229 (N.D.Ill.) (\$14 million sexual harassment recovery for class of 532 assistant public defenders and law

clerks certified in suit alleging hostile work environment due to egregious harassment by pre-trial detainees).

- b. *U.S.A. ex rel. Lokesh Chandra, M.D. v. Sushil A. Sheth, M.D.*, Case No. 06 C 2191 (N.D. Ill.) (False Claims Act case; \$20 million settlement with the United States government).
- c. *Nelson v. UBS Global Management*, No. 03-C-6446, 04 C 7660 (N. D. Ill.)(ERISA class action on behalf of thousands of BP Amoco employees who had Enron debt purchased as part of their money market fund; recovery of approximately \$7 million).
- d. *Franzen v. IDS Futures Corporation*, 06 CV 3012 (N. D. Ill. 2006)(recovery of millions of dollars for more than 1,000 limited partners in an investment fund that lost value as a result of the Refco bankruptcy).
- e. *Kuhl v. Guitar Center*, Case No. 07 C 214 (J. Gottschall)(nation-wide FLSA and Rule 23 class for commissioned sales force; class settlement of \$2,870,000 - 9000 class members)
- f. *Pope v. Harvard Bancshares*, 06 CV 988, 240 F.R.D 383 (N. D. Ill. 2006)(class action recovery of \$1.3 million for former shareholders of community bank who had stock repurchased in a reorganization).
- g. *Johnson v Resthaven/Providence Life Services*, 2019CH1813 (Cook County, IL)(\$3 million class action recovery under Biometric Information Privacy Act)

- h. *Cesarz et al v. Wynn Las Vegas LLC et al*, 2:13-cv-00109 (Nevada)(\$5.6 million FLSA settlement against Wynn Las Vegas casino workers)
- i. *Barnes v. Aryzta, LLC*, 288 F. Supp. 3d 834 (N.D. Ill and Cook County)(\$2.9 million class action recovery under BIPA)
- j. *Cruz v. Unilock Chicago, Inc.*, (J. Colwell) 383 Ill. App. 3d 752; 892 N.E.2d 78; 322 Ill. Dec. 831 (1st Dist. 2008)(certified class of 300 plant employees under IMWL and IWPCA; class-wide settlement of \$1,600,000)
- k. *Canas v. Smithfield Foods*, 2020CV4937(\$7.75 million recovery under FLSA and IMWL for COVID-19 pandemic related bonuses)
- l. *Pietrzycki v. Heights Tower Serv., Inc.*, 197 F. Supp. 3d 1007 (N.D. Ill. 2016)(finding Fish appropriate to represent Class in wage and hour claims relating to overtime; case ultimately resolved on a class wide basis prior to trial).
- m. *WAM Holdings, Inc d/b/a All Star Management, Inc./Wendy's*, Cook County, Case No. 2019-CH-11575 (\$5.85 million class action recovery under the Biometric Information Privacy Act)
- n. *Balonek et al v. Safeway et al.*, No. 14-cv-01457 (N.D.Ill.) (class action settlement under FLSA and IMWL for \$1.7 million on behalf of General Merchandise Managers and Assistant General Merchandise managers who worked in Illinois at Dominick's)

- o. *Ralph/Memoli v. Get Fresh Produce Inc.*, 2019CH2324 (\$675,000 settlement on a class wide basis for claims under Biometric Information Privacy Act)
- p. *Parker v. DaBecca Natural Foods*, 2019CH1845 (\$999,975 settlement on a class wide basis for claims under Biometric Information Privacy Act)
- q. *Blount v. Stroud, et al.*, 01 L 2330 (Cook County, IL)(\$3.1 million verdict for retaliatory discharge and retaliation under 42 U.S.C. §1981, November 2005; 376 Ill. App. 3d 935, 877 N.E.2d 49 (1st Dist. 2007)(verdict rev'd. on IDHR preemption grounds); PLA recon. granted to Illinois Supreme Court - 232 Ill. 2d 302, 904 N.E.2d 1 (2008)(reversing and remanding to Appellate Court), 395 Ill. App. 3d 8; 915 N.E.2d 925; 2009 Ill. App. LEXIS 553; 333 Ill. Dec. 854; 106 Fair Empl. Prac. Cas. (BNA) 1163 (1st Dist. - Oct. 6, 2009);(denying remaining post-trial appeals and reinstating jury verdict); Rehearing den., 2009 Ill. App. LEXIS 1051 (Ill. App. Ct. 1st Dist., Oct. 2, 2009); defense appeal denied 2010 Ill. LEXIS 160 (Ill., Jan. 27, 2010); cert den., 131 S. Ct. 503 (2010)(initial fee petition in amount of \$1,156,589 granted)
- r. *Day v. NuCO2 Mgmt., LLC*, 1:18-CV-02088, 2018 WL 2473472, at *1 (N.D. Ill. May 18, 2018)(serving as the collective's co-counsel in a \$900,000 settlement under FLSA)
- s. *USA ex rel. Dr. Raymond Pollak v. University of Illinois, et al.*, Case No. 99 C 710 (Intervened False Claims Act; partial settlements in 2003 of \$2.4 million on Medicare and Medicaid fraud, false hospitalizations in liver transplant).

- t. *Mello et al v. Krieger Kiddie Corporation*, 15-cv-5660 (collective and putative class action alleging claims under FLSA, IMWL, IWPCA).
- u. *Bell v. UPS, Case No. 94 CH 1658 (Cook Co.)*(\$7.25 million settlement of class action overtime case for 3000+ Illinois package car drivers)
- v. *Sotelo v. DirectRevenue*, No. 05-2562 (N.D. Ill. filed Apr. 29, 2005)(class action alleging that company placed “spyware” on consumers’ computers; resulted in a settlement that mandated significant disclosures to computer users before unwanted software could be placed on their computers, see also Julie Anderson, *Sotelo v. Directrevenue, LLC: Paving the Way for Spyware-Free Internet*, 22 Santa Clara High Tech. L.J. 841 (2005).
- w. *LaPlaca v. Malnati et al.*, No. 15-cv-1312 (N.D.Ill.) (Class action on behalf of restaurant employees, \$850,00 court-approved settlement).
- x. *Sharples et al v. Krieger Kiddie Corporation*, 2013 CH 25358 (Cir. Court Cook County) (Illinois Wage Payment and Collection Act IWPCA class action claims; final approval of class wide settlement).
- y. *Kusinski v. MacNeil Automotive Products Limited*, 17-cv-03618 (class and collective claims under the FLSA and the IMWL; final approval of class settlement entered);
- z. *Gabryszak v. Aurora Bull Dog Co.*, 427 F. Supp. 3d 994 (N.D. Ill. 2019)(obtaining partial summary judgment for Collective under FLSA in a tip credit case for servers).